

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SAIM SARWAR,

Plaintiff,

v.

SALEEM MOHAMMAD,

Defendant.

Case No.: 2:20-cv-01391-NR

**JOINT MOTION TO FURTHER CONTINUE ALL DEADLINES  
IN ANTICIPATION OF DISMISSAL OF SUIT**

Plaintiff Saim Sarwar (“Plaintiff”) and Defendant Mohammad Saleem (erroneously sued as Saleem Mohammad) (“Defendant”) by and through their undersigned counsel, hereby move the Court for an Order continuing all deadlines in this matter for 21 days. In support of that Motion, the Parties state the following:

1. Plaintiff’s Complaint was filed on September 15, 2020. (Doc. 1.) Defendant’s deadline to respond to the Complaint was initially October 13, 2020.
2. On October 12, 2020 this Court approved the Parties’ stipulated extension that extended Defendant’s deadline to respond to the Complaint to October 27, 2020. (Doc. 8.)
3. On October 27, 2020, Defendant moved for an unopposed continuance of its deadline until November 10, 2020, which this Court granted on October 28, 2020. (Docs. 11 & 12).

4. On November 5, 2020, as part of the discussions required by Fed. R. Civ. P. 16 and 26, the parties preliminarily agreed to an anticipated dismissal of this matter. The parties requested a continuance of all deadlines for 14 days in order to finalize that dismissal.

5. On November 10, 2020, upon the Parties' Joint Motion to Continue all Deadlines in Anticipation of Dismissal of Suit, this Court granted a 14 day continuance of all deadlines in this matter. (Docs. 18 and 19).

6. The parties have nearly finalized that dismissal but, pending certain ministerial acts between the parties, anticipate that final dismissal could take up to 21 days to occur. Accordingly, the parties request an additional 21 day continuance of all deadlines in this matter.

7. The Parties' request is made in good faith and for justified and compelling reasons.

**WHEREFORE**, Plaintiff Sarwar and Defendant Saleem pray that this Court extend all deadlines for 21 days.

Dated: November 24, 2020

Respectfully submitted,

**THOMAS B. BACON, P.A.**

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Respectfully submitted,

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